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***LLC; and MavorCo Operations, LLC***

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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**BLENDTEC INC., a Utah Corporation**

*Plaintiff,*

v.

**BLENDJET INC., a Delaware corporation,  
MAVORCO HOLDINGS, LLC, a  
Delaware limited liability company,  
MAVORCO IP, LLC, a Delaware limited  
liability company, and MAVORCO  
OPERATIONS, LLC, Delaware limited  
liability company,**

*Defendants.*

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**MAVORCO'S MOTION FOR LEAVE TO  
FILE UNDER SEAL ITS UNREDACTED  
SUPPLEMENTAL BRIEF IN  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR A PRELIMINARY  
INJUNCTION AND CERTAIN  
EXHIBITS THERETO**

Civil No. 2:25-cv-00096-RJS-DBP

Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

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Pursuant to DUCivR 5-3(b)(2), and the Standard Protective Order that applies in all civil cases in the U.S. District Court for the District of Utah (the “Standard Protective Order”), Defendants MavorCo Holdings, LLC, MavorCo IP, LLC, and MavorCo Operations, LLC (collectively “Defendants” or “MavorCo”), by and through counsel, hereby respectfully move this Court to file under seal the unredacted version of MavorCo’s Supplemental Brief in Opposition to Plaintiff’s Motion for a Preliminary Injunction (the “Supplemental Brief”), along with Exhibits 1–9, 11, 12, 15–17, and 20–22 to the Supplemental Brief.

MavorCo files its Supplemental Brief pursuant to this Court’s Order of June 11, 2025 (D.I. 66). The Supplemental Brief and above-identified exhibits pertain to discovery that was produced in the case *Blendtec Inc., v. BlendJet Inc.*, No. 2:21-cv-00668, in the U.S. District Court for the District of Utah (the “2021 Action”) pursuant to the Standard Protective Order, and which were designated as Confidential Information—Attorneys’ Eyes Only by Blendtec and third-party Brigham Young University. MavorCo moves this Court for leave to file under seal the Exhibits 1–9, 11, 12, 15–17, and 20–22 to the Supplemental Brief and the portions of its Supplemental Brief that either quote and/or describe these exhibits, as these documents contain material that has been designated as Confidential Information – Attorneys’ Eyes Only by Blendtec and third-party Brigham Young University in the 2021 Action, pursuant to the Standard Protective Order. MavorCo is filing publicly a redacted version of this Supplemental Brief. Pursuant to DUCivR 5-3(b)(2)(C)(i), if Blendtec and/or Brigham Young University seek to have these documents remain under seal, they must file a motion for leave to file under seal within 7 days of service of this notice.

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For the foregoing reasons, MavorCo respectfully requests that the Court enter an Order restricting public access to and/or sealing the above-identified unredacted portions of MavorCo’s

Supplemental Brief in Opposition to Plaintiff's Motion for a Preliminary Injunction and Exhibits  
1–9, 11, 12, 15–17, and 20–22 thereto.

Respectfully submitted, this 23rd day of July, 2025.

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 23, 2025, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to counsel of record for all parties to this action registered with the CM/ECF system.

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